

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 2:24-CR-20562

Honorable Brandy R. McMillion

v.

SHAWN PATRICK SMITH,

Defendant.

MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

The United States of America, by and through the undersigned counsel, respectfully moves for leave to file a document under seal. The document at issue is an opposed motion for judicial inquiry into a possible conflict of interest on the part of counsel for the defendant. That motion and its appendices contain sensitive details about a potential ethical issue on the part of defense counsel. A Proposed Order will be submitted via the ECF utility.

Defense counsel has not yet responded to a request for its position regarding this motion for leave to file the document under seal.

Dated: January 8, 2025

Respectfully submitted,

David A. Hubbert
Deputy Assistant Attorney General
Department of Justice, Tax Division

By: /s/ Jeffrey A. McLellan
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CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2025, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will notify counsel of record.

/s/ Jeffrey A. McLellan
JEFFREY A. MCLELLAN
Trial Attorney, Tax Division
U.S. Department of Justice